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*Counsel for Additional Ignition Switch
Pre-Closing Plaintiffs Listed on Exhibit A*

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:
MOTORS LIQUIDATIONS COMPANY, et al.
f/k/a General Motors Corp., et al.

Debtors.

Chapter 11
Case No.: 09-50026 (MG)

(Jointly Administered)

**SECOND SUPPLEMENT TO MOTION [ECF No. 14018] BY ADDITIONAL IGNITION
SWITCH PRE-CLOSING ACCIDENT PLAINTIFFS FOR AUTHORITY TO FILE
LATE PROOFS OF CLAIM FOR PERSONAL INJURIES AND WRONGFUL DEATHS**

The Additional Ignition Switch Pre-Closing Accident Plaintiffs¹ listed on the attached Exhibit A (the “Movants”), by and through the undersigned counsel, hereby file this Second Supplement to their pending motion at ECF No. 14018 (“Supplement to Motion”) and request that the Court allow the Movants to file late claims against the estate of Motors Liquidation Company, et al. (the “Debtors”) and for those claims to be deemed timely. In support of their Motion and the Supplement to Motion, the Movants respectfully state as follows:

¹ The “Additional Ignition Switch Pre-Closing Accident Plaintiffs” identified on Exhibit “A”, and the amendments and supplements thereto, were not included in the Omnibus Motion filed by Certain Ignition Switch Pre-Closing [ECF No. 13807], and are not represented by counsel for the Ignition Switch Pre-Closing Accident Plaintiffs, but are seeking the same relief set forth in the motion at Docket No. 13807, which is still pending and for which oral arguments have not yet occurred. These “Additional Ignition Switch Pre-Closing Accident Plaintiffs” are included in the subset of the Pre-Closing Accident Plaintiffs that had the Ignition Switch in their Subject Vehicles, but did not receive notice of the filing of Docket No. 13807 or the deadline to join in that motion. However, since the motion at Docket No. 13807 is still pending, the Movants herein are seeking to participate in the hearings on this matter and be considered for the same relief requested by the Ignition Switch Pre-Closing Accident Plaintiffs.

Description of Supplemental Evidence

1. The purpose of this supplement is to provide additional information and evidence to be considered in conjunction with the Motion filed by Movants on July 28, 2017 at Docket No. 14018, which is hereby incorporated by reference as if set forth fully herein.

2. Specifically, Exhibit "A" attached hereto includes an updated and complete list of "Additional Ignition Switch Pre-Closing Accident Plaintiffs" to-date. The complete list set forth in Exhibit "A" identifies 348 Plaintiffs, including the original 171 Plaintiffs identified in the Motion (see ECF No. 14018) and 113 Plaintiffs identified in the First Supplement (see ECF No. 14046).

3. Exhibit "B" attached hereto includes proofs of claims for the 64 new Plaintiffs included with this supplement.

Conclusion

Movants respectfully request entry of an order deeming the Movants' proofs of claim timely filed and such other and further relief as this Court finds just and proper.

Dated: September 19, 2017

Respectfully submitted,

ANDREWS MYERS, P.C.

/s/ Lisa M. Norman

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Pre-Closing Plaintiffs Listed on Exhibit A*

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document, filed through the CM/ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF), copies will also be served by email on September 19, 2017 on those parties listed as "Notice Parties" under the Court's December 12, 2016 Order to Show Cause [ECF No. 13802], with paper copies served by first class mail postage prepaid on all Notice Parties for whom email addresses are unavailable.

/s/ Lisa M. Norman
LISA M. NORMAN

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